

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Iva Bonelli	Debtor (s)	Chapter 13
Iva Bonelli	<u>Debtor (s)</u>	NO. 20-14471
vs.		
Nationstar Mortgage, LLC d/b/a Mr. Cooper	<u>Respondent</u>	
WILLIAM C. MILLER	<u>Trustee</u>	

OBJECTION TO PROOF OF CLAIM OF NATIONSTAR MORTGAGE, LLC D/B/A MR. COOPER

Iva Bonelli, Debtor(s), by and through counsel, Anthony A. Frigo, Esquire, hereby files this Objection to Proof of Claim, filed on January 7, 2021, by Nationstar Mortgage, LLC d/b/a Mr. Cooper, and in support thereof aver as follows:

1. William Miller is the duly appointed Trustee in this case.
2. Nationstar Mortgage, LLC d/b/a Mr. Cooper, by and through counsel, filed a secured Proof of Claim on January 7, 2021, listed as Claim No. 2 on the Claims Register, alleging entitlement to \$23, 721.12 in pre- arrears consisting of :

Principal balance	\$ 22,855.68
Prepetition fees due	400.00
Escrow deficiency for funds advanced	569.00
Less funds on hand	<u>-103.56</u>
Total	<u>\$ 23,721.12</u>

on the basis of a mortgage document. (A true and correct copy of the proof of claim No. 11 is attached hereto, made a part hereof and marked as EXHIBIT "A.")

3. Per Chester County Recorder of Deeds Office a satisfaction of the underlying mortgage was filed on December 10, 2018. (A true and correct copy of the Satisfaction is attached hereto, made a part hereof and marked as EXHIBIT "B.")
4. The Satisfaction recites the same dollar amount as the Mortgage per the proof of Claim (\$47,000.00).
5. The Satisfaction recites the same date as the Mortgage per the proof of Claim (1/22/2007).
6. The Satisfaction recites the same instrument number as the Mortgage per the proof of Claim (10725488).
7. The Satisfaction recites the same Book and Page Number as the Mortgage per the proof of Claim (Book 7072, Page 2363).
8. The Satisfaction recites the same property address as the Mortgage per the proof of Claim (13 Landmark Drive, Malvern, PA 19355).

WHEREFORE, Debtor respectfully requests the entry of an order disallowing Nationstar Mortgage, LLC d/b/a Mr. Cooper's Proof of Claim together with reasonable attorney's fees and costs associated with this objection and such other relief as may be appropriate.

Date: May 4, 2021

/S/Anthony A. Frigo
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